

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

IN RE:

Ivy K. Nimley

Debtor

CHAPTER 13

CASE NO. 15-10747-DF

OBJECTION TO DEBTOR'S CHAPTER 13 PLAN

Now comes RoundPoint Mortgage Servicing Corp., as servicer for Taylor Bean & Whitaker Mortgage Corp. ("RoundPoint") and files its objection to confirmation of the Debtor's Chapter 13 Plan. In support of its objection, RoundPoint states as follows:

1. RoundPoint is the servicer for the holder of the first mortgage on the Debtor's property located at 162 Courtland Street, Providence, RI 02909.
2. The mortgage to RoundPoint is in default with an approximate pre-petition arrearage of \$176,157.65 and a total debt claim of \$421,481.02. The Proof of Claim bar date is August 20, 2015.
3. The Debtor's Chapter 13 Plan fails to provide for the pre-petition arrears owed to RoundPoint.

WHEREFORE, RoundPoint Mortgage Servicing Corp., as servicer for Taylor Bean & Whitaker Mortgage Corp. respectfully requests that the Court deny confirmation of the Debtor's Chapter 13 Plan or for such other relief as the Court deems just and proper.

RoundPoint Mortgage Servicing Corp., as servicer
for Taylor Bean & Whitaker Mortgage Corp.,
By its Attorney

/s/ Tatyana P. Tabachnik

Tatyana P. Tabachnik, Esquire
RI #8911

HARMON LAW OFFICES, P.C.

150 California Street

Newton, MA 02458

617-558-0500

ribk@harmonlaw.com

Dated: June 4, 2015

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

IN RE:

Ivy K. Nimley

CHAPTER 13

CASE NO. 15-10747-DF

CERTIFICATE OF SERVICE

I, Tatyana P. Tabachnik, Esquire, state that on June 4, 2015, I electronically filed the foregoing document with the United States Bankruptcy Court for the District of Rhode Island using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

Jack D. Pitts, Esquire for the Debtor
John Boyajian, Esquire, Chapter 13 Trustee
Gary L. Donahue, Esquire, Assistant U.S. Trustee
Timothy W. Larson, Esquire for U.S. Bank N.A., as trustee, on behalf of the holders of the J.P. Morgan Mortgage Acquisition Trust 2006-CH2 Asset Backed Pass-Through Certificates, Series 2006-CH2

I certify that I have mailed by first class mail, postage prepaid the documents electronically filed with the Court on the following non CM/ECF participants:

/s/ Tatyana P. Tabachnik

Tatyana P. Tabachnik, Esquire
RI# 8911

Ivy K. Nimley
PO Box 72808
Providence, RI 02907

Ivy K. Nimley
162 Courtland Street
Providence, RI 02909

Rhode Island Division of Taxation
Bankruptcy Unit
One Capitol Hill
Providence, RI 02908